

FILED

JUN 23 2021

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY hm  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION

UNITED STATES OF AMERICA,

§ CAUSE NO. EP-21-CR-

Plaintiff,

§ INDICTMENT

v.

§ CT 1: 18 U.S.C. § 111(a)(1) & (b)-  
§ Assault of a Federal Officer

MIGUEL MARTINEZ,

§ CT 2: 18 U.S.C. § 1361 – Damage to  
§ Government Property Under \$1,000

Defendant.

THE GRAND JURY CHARGES:

**EP21CR1063**

COUNT ONE

(18 U.S.C. §§ 111(a)(1) & (b))

That on or about June 6, 2021, in the Western District of Texas, Defendant,

**MIGUEL MARTINEZ,**

knowingly and intentionally did forcibly assault, resist, oppose, impede, intimidate, and interfere with a person designated in Title 18, United States Code, Section 1114, namely: J.E., a United States Border Patrol Agent, while he was engaged in and on account of his official duties, and where such act involved the use of a dangerous and deadly weapon, in violation of Title 18, United States Code, Section 111(a)(1) & (b).

COUNT TWO

(18 U.S.C. § 1361)

That on or about June 6, 2021, in the Western District of Texas, Defendant,

**MIGUEL MARTINEZ,**

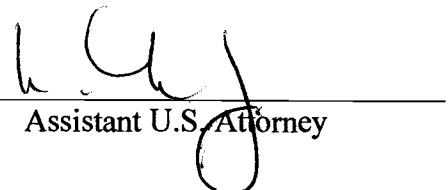
willfully and by means of throwing a screwdriver from a moving vehicle, did injure and commit a depredation against property of the United States and of any department and agency thereof, to wit: the United States Border Patrol, specifically the windshield of a United States Border Patrol vehicle, and the resulting damage was less than \$1,000, in violation of Title 18, United States Code, Section 1361.

A TRUE BILL  
~~REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002~~

FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

BY:

  
Assistant U.S. Attorney